

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

IN RE: USA GYMNASTICS,¹

Debtor.

Chapter 11

Case No. 18-09108-RLM-11

**NOTICE OF DRAW RE: MONTHLY FEE STATEMENTS
OF MILLER JOHNSON AS SPECIAL COUNSEL TO THE DEBTOR IN POSSESSION,
FOR SERVICES RENDERED AND REIMBURSEMENT OF EXPENSES,
FROM JULY 1, 2019 THROUGH JULY 31, 2019
PURSUANT TO ORDER GRANTING DEBTOR'S MOTION
FOR ENTRY OF ORDER ESTABLISHING PROCEDURES FOR INTERIM
COMPENSATION AND REIMBURSEMENT OF PROFESSIONALS [DN 187]**

Notice is hereby given that Miller Johnson, Special Counsel to the Debtor In Possession, has filed its Consolidated Monthly Statements of Fees and Expenses for the Period From July 1, 2019 through July 31, 2019, with the Bankruptcy Court.

Notice is further given that said statements, which include total fees of \$43,133.50 and total expenses of \$70.70, are attached to hereto as **Exhibits A(1) – A(2)**.

If you have an objection to all or any portion of any of the above-referenced statements, you have fourteen (14) days from the date this notice is filed with the Court to serve a written Notice of Objection on Miller Johnson, Attn: John T. Piggins, P.O. Box 306, Grand Rapids, Michigan 49501-0306 and by email at pigginsj@millerjohnson.com. The Notice of Objection must set forth the precise nature of the objection and the amount at issue.

If no Notice of Objection is timely served on Miller Johnson, the Debtor shall promptly pay 80% of the fees and 100% of the expenses set out above, subject to final approval by the Court at a future hearing.

If a timely Notice of Objection is served regarding some but not all of the above-referenced fees and expenses, the Debtor shall promptly pay 80% of the fees and 100% of the expenses that are not the subject of a timely Notice of Objection, subject to final approval by the Court at a future hearing.

If you serve a Notice of Objection on Miller Johnson and you are unable to resolve your objection within fourteen (14) days after service, you may file your objection with the Court.

Upon filing an objection with the Court, a subsequent Notice will be sent to you with the date, time and location of the hearing on the objection.

¹ The last four digits of the Debtor's federal tax identification number are 7871. The location of the Debtor's principal office is 130 E. Washington Street, Suite 700, Indianapolis, Indiana 46204.

**A COPY OF ANY OBJECTION
FILED WITH THE COURT MUST ALSO BE SENT TO:**

Office of the United States Trustee
101 W Ohio St
Indianapolis, IN 46204

Miller Johnson
Attn: John T. Piggins
P.O. Box 306
Grand Rapids, MI 49501-0306

And by email to:
pigginsj@millerjohnson.com

Sexual Abuse Survivors Committee
c/o Meredith R. Theisen
Rubin & Levin, P.C.
135 N. Pennsylvania St., Suite 1400
Indianapolis, IN 46204

And by email to: mtheisen@rubin-levin.net

Date: 8/21, 2019

USA Gymnastics
130 E. Washington Street
Suite 700
Indianapolis, IN 46204

Dean Panos, Esq.
Melissa M. Root, Esq.
Catherine L. Steege, Esq.
Jenner & Block LLP
353 N. Clark Street
Chicago, IL 60654

And by email to dpanos@jenner.com;
mroot@jenner.com; and
csteegen@jenner.com

Sexual Abuse Survivors Committee
c/o James I. Stang
Pachulski Stang Ziehl & Jones LLP
10100 Santa Monica Blvd.
Ste 1300
Los Angeles, CA 90067

And by email to: jstang@pszjlaw.com



John T. Piggins (Michigan Bar #P34495)
pigginsj@millerjohnson.com
P.O. Box 306
Grand Rapids, MI 49501-0306
(616) 831-1793

EXHIBIT A(1)

PO Box 306
Grand Rapids, Michigan 49501-0306
616.831.1700
TAX ID# 38-1603110

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USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: Ropes & Gray and Other Investigations

For Legal Services Rendered through July 31, 2019

7/02/19	JWC	Update production tracker with production details	.60	90.00
7/03/19	JWC	Investigate productions that are missing values in production tracker	1.60	240.00
7/08/19	JWC	Search for documents for first Indiana Attorney General production in Relativity	1.20	180.00
7/08/19	JWC	Perform conflict checks of documents for first Indiana Attorney General production in Relativity	1.80	270.00
7/08/19	JWC	Prepare documents for first Indiana Attorney General production in Relativity	.80	120.00
7/08/19	JWC	Send first Indiana Attorney General production set for running in Relativity	.20	30.00
7/09/19	JWC	Create saved search of all hard copy documents in Relativity	.80	120.00
7/10/19	JWC	Download production USAG_INDAG_052	.40	60.00
7/10/19	JWC	Extract production USAG_INDAG_052	.20	30.00
7/10/19	JWC	Perform quality control checks of production USAG_INDAG_052	1.80	270.00
7/10/19	JWC	Prepare production USAG_INDAG_052 for delivery	.60	90.00

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7/10/19	JWC	Send production USAG_INDAG_052 for delivery	.20	30.00
7/10/19	ACC	Telephone conference with James W. Casteel regarding documents for Indiana Attorney General	.20	43.00
7/12/19	ACC	Telephone conference with Rebecca L. Strauss regarding Indiana Attorney General production	.20	43.00
7/12/19	ACC	Review Barnes & Thornburg edits to cover letter to Indiana Attorney General regarding production and make edits	.40	86.00
7/15/19	JWC	Provide cross reference files for specific productions	.80	120.00
7/15/19	JWC	Update production tracker	.20	30.00
7/15/19	ACC	Coordinate production of privileged documents and creation of privilege log for the Indiana Attorney General	1.00	215.00
7/15/19	ACC	Work on identifying documents with native redactions pursuant to questions by Jenner & Block regarding production	.40	86.00
7/15/19	ACC	Telephone conference with Rebecca L. Strauss and Jenner & Block regarding documents for the Indiana Attorney General	.30	64.50
7/15/19	RLS	Edit letter to Indiana Attorney General regarding privileged documents	.70	245.00
7/16/19	JWC	Create saved searches for documents with conflicting values for certain	1.20	180.00

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produced documents

7/16/19	JWC	Search for documents for supplemental partially privileged Indiana Attorney General production in Relativity	.80	120.00
7/16/19	JWC	Perform conflict checks of documents for supplemental partially privileged Indiana Attorney General production in Relativity	1.00	150.00
7/16/19	JWC	Prepare documents for supplemental partially privileged Indiana Attorney General production in Relativity	.20	30.00
7/16/19	JWC	Send supplemental partially privileged Indiana Attorney General production set for running in Relativity	.20	30.00
7/16/19	JWC	Search for documents for fully privileged Indiana Attorney General production in Relativity	1.40	210.00
7/16/19	JWC	Perform conflict checks of documents for fully privileged Indiana Attorney General production in Relativity	1.80	270.00
7/16/19	JWC	Prepare documents for fully privileged Indiana Attorney General production in Relativity	.80	120.00
7/16/19	JWC	Send fully privileged Indiana Attorney General production set for running in Relativity	.20	30.00
7/16/19	ACC	Review documents marked wholly privileged with redactions in the secondary mark up set to resolve privilege status before Indiana Attorney General production	.30	64.50

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7/17/19	JWC	Download production USAG_INDAG_053	.20	30.00
7/17/19	JWC	Extract production USAG_INDAG_053	.20	30.00
7/17/19	JWC	Perform quality control checks of production USAG_INDAG_053	1.80	270.00
7/17/19	JWC	Prepare production USAG_INDAG_053 for delivery	.60	90.00
7/17/19	JWC	Send production USAG_INDAG_053 for delivery	.20	30.00
7/17/19	JWC	Update production tracker	.40	60.00
7/18/19	JWC	Download production USAG_INDAG_054	.40	60.00
7/18/19	JWC	Extract production USAG_INDAG_054	.20	30.00
7/18/19	JWC	Perform quality control checks of production USAG_INDAG_054	2.60	390.00
7/18/19	JWC	Prepare production USAG_INDAG_054 for delivery	1.20	180.00
7/18/19	JWC	Send production USAG_INDAG_054 for delivery	.40	60.00
7/18/19	ACC	Telephone conference with Rebecca L. Strauss and James W. Casteel regarding Indiana Attorney General strategy	.30	64.50
7/19/19	JWC	Create combined cross reference file from multiple productions	.60	90.00
7/19/19	JWC	Begin work on creating custom privilege log for productions	1.60	240.00
7/22/19	JWC	Finish creating custom privilege log for productions	3.80	570.00

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7/22/19	JWC	Perform additional quality control on production USAG_INDAG_054 once errors were discovered	1.20	180.00
7/22/19	ACC	Telephone conference with James W. Casteel regarding Indiana Attorney General production	.10	21.50
7/23/19	JWC	Perform conflict checks of documents for re-run of fully privileged Indiana Attorney General production in Relativity	1.20	180.00
7/23/19	JWC	Prepare documents for re-run of fully privileged Indiana Attorney General production in Relativity	.40	60.00
7/23/19	JWC	Send re-run of fully privileged Indiana Attorney General production set for running in Relativity	.20	30.00
7/23/19	ACC	Review and edit Jenner & Block edits to cover letter to Indiana Attorney General regarding production	.20	43.00
7/24/19	JWC	Download production fix USAG_INDAG_054	.40	60.00
7/24/19	JWC	Extract production fix USAG_INDAG_054	.20	30.00
7/24/19	JWC	Perform quality control checks of production fix USAG_INDAG_054	2.20	330.00
7/24/19	JWC	Prepare production fix USAG_INDAG_054 for delivery	1.40	210.00
7/24/19	JWC	Send production fix USAG_INDAG_054 for delivery	.20	30.00
7/24/19	JWC	Prepare new privilege log	.40	60.00
7/24/19	JWC	Perform quality control on new	.60	90.00

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privilege log

7/24/19	JWC	Send new privilege log for delivery	.20	30.00
7/25/19	ACC	Coordinate production for Indiana Attorney General	.40	86.00
7/26/19	JWC	Draft loading instructions for productions	1.40	210.00
7/26/19	JWC	Perform conflict checks of documents for second re-run of fully privileged Indiana Attorney General production in Relativity	1.00	150.00
7/26/19	JWC	Prepare documents for second re-run of fully privileged Indiana Attorney General production in Relativity	.60	90.00
7/26/19	JWC	Send second re-run of fully privileged Indiana Attorney General production set for running in Relativity	.20	30.00
7/26/19	ACC	Coordinate document production to the Indiana Attorney General with Barnes & Thornburg and James W. Casteel	1.50	322.50
7/26/19	ACC	Review and edit proposed privilege log for Indiana Attorney General	1.50	322.50
7/29/19	JWC	Download production USAG_INDAG_054A	.40	60.00
7/29/19	JWC	Extract production USAG_INDAG_054A	.20	30.00
7/29/19	JWC	Perform quality control checks of production USAG_INDAG_054A	1.80	270.00
7/29/19	JWC	Prepare production USAG_INDAG_054A for delivery	1.20	180.00
7/29/19	JWC	Download production USAG_INDAG_054B	.20	30.00

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7/29/19	JWC	Extract production USAG_INDAG_054B	.20	30.00
7/29/19	JWC	Perform quality control checks of production USAG_INDAG_054B	1.60	240.00
7/29/19	JWC	Prepare production USAG_INDAG_054B for delivery	1.20	180.00
7/29/19	ACC	Coordinate production for Indiana Attorney General with James Casteel and Jenner & Block	.30	64.50
7/29/19	CJS	Correspondence with Gibson Dunn regarding proposed legislation	.20	70.00
7/29/19	CJS	Initial analysis regarding Senate report	.30	105.00
7/30/19	JWC	Combine productions USAG_INDAG_054A and USAG_INDAG_054B	1.40	210.00
7/30/19	JWC	Perform quality control on combined production	1.20	180.00
7/30/19	JWC	Send combined production for delivery	.40	60.00
7/30/19	JWC	Search for partially privileged documents without privilege type field set in Relativity	.60	90.00
7/30/19	ACC	Coordinate Indiana Attorney General production with Barnes & Thornburg and Jenner & Block	.40	86.00
7/30/19	ACC	Review files in Relativity related to certain individuals (Li, Wu, Legacy) per Indiana Attorney General request	.60	129.00
7/30/19	CJS	Analysis of media articles regarding Senate report and details of proposed	.50	175.00

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legislation

7/30/19	CJS	Correspondence with Gibson Dunn regarding Senate report	.20	70.00
7/30/19	CJS	Initial review of Senate's report and proposed legislation	3.10	1,085.00
7/31/19	JWC	Telephone conference with Epiq regarding handling of production issues	.80	120.00
7/31/19	ACC	Telephone Conferences with James Casteel regarding document review matters	.80	172.00
7/31/19	ACC	Telephone Conference with Rebecca L. Strauss regarding document review matters	.30	64.50
7/31/19	ACC	Call with Mark Stuuuan regarding Indiana Attorney General production and CID requests	.70	150.50
7/31/19	ACC	Coordinate Indiana Attorney General production with Barnes & Thornburg and Jenner & Block	.60	129.00
7/31/19	DJG	Conference with Christopher J. Schneider regarding Senate report	.20	90.00
7/31/19	CJS	Telephone conference with Mark Stuaan regarding Indiana Attorney General requests	.20	70.00
TOTAL HOURS			71.90	
Total Services				12,567.50

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Attorney Summary

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Casteel, James W	Lit Support Proj Mg	56.00	150.00	8,400.00
Schneider, Christopher J.	Member	4.50	350.00	1,575.00
Strauss, Rebecca L.	Member	.70	350.00	245.00
Gass, David J.	Member	.20	450.00	90.00
Contreras-Caballero, Alej	Associate	10.50	215.00	2,257.50
		71.90		12,567.50

Total This Invoice

12,567.50

Invoices Due Upon Receipt

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OUTSTANDING ACCOUNTS RECEIVABLE

INVOICE NUMBER	DATE	INVOICE AMOUNT	PAYMENTS AGAINST INVOICE	INVOICE BALANCE
1690140	2/14/19	46,412.85	37,183.65	9,229.20
1691019	3/18/19	26,448.80	21,491.90	4,956.90
1694036	4/17/19	21,810.30	17,454.60	4,355.70
1696898	5/21/19	18,459.25	14,769.05	3,690.20
1699810	6/13/19	12,034.50	9,627.60	2,406.90
1702745	7/15/19	11,082.50	.00	11,082.50
		Prior Unpaid Balance		35,721.40
		Total Amount Due		48,288.90

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USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: Ropes & Gray and Other Investigations

REMITTANCE ADVICE

For Legal Services Rendered through July 31, 2019

Total Services 12,567.50

Total This Invoice 12,567.50
=====

Invoice Is Due Upon Receipt

Our remit address is: PO Box 306, Grand Rapids, MI. 49501-0306

Payments: If paying by check please return the remittance advice or write your invoice number(s) on your check. You may also pay by credit or debit card through our online payment portal www.millerjohnson.com/onlinepayments. If you have any questions regarding this invoice or you wish to set up ACH payments please call 616-831-1700 and ask for the collections department.

EXHIBIT A(2)

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Grand Rapids, Michigan 49501-0306
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USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: CJS Chief Legal Officer

For Legal Services Rendered through July 31, 2019

7/01/19	JLC	Review SafeSport policy terms	1.50	150.00
7/01/19	CJS	Correspondence with Annie Heffernon regarding potential conflict of interest issue	.10	35.00
7/01/19	CJS	Correspondence with Mark Busby regarding code of ethical conduct matter	.10	35.00
7/01/19	CJS	Telephone conference with Stefanie Korepin regarding selection committee matters	.20	70.00
7/01/19	CJS	Revise SafeSport Policy and Procedures	.70	245.00
7/01/19	CJS	Revise BDO engagement letter	.30	105.00
7/01/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
7/01/19	CJS	Call with Trampoline & Tumbling selection committee regarding selection matters	1.30	455.00
7/01/19	CJS	Correspondence with USOC regarding 2019 compliance checklist	.10	35.00
7/02/19	ACC	Conference with Christopher J. Schneider to discuss meeting with the selection committee	.10	21.50
7/02/19	CJS	Correspondence with Kathryn Carson regarding Athlete Council Matter	.20	70.00

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7/02/19	CJS	Telephone conference with Alejandra Contreras regarding selection committee meeting	.10	35.00
7/02/19	CJS	Telephone conference with Kevin White regarding selection committee meeting	.10	35.00
7/03/19	AMC	Begin review of 2020 USA Gymnastics Championships Event Agreement	.60	174.00
7/03/19	AMC	Correspondence with J. Smith regarding 2020 USA Gymnastics Championships Event Agreement	.20	58.00
7/03/19	ACC	Review selection procedures for Rhythmic and Trampoline games in preparation for selection committee meeting	1.00	215.00
7/03/19	DAP	Telephone conference with Patrick Murphy regarding subpoena issued in the Hilliard case	.10	45.00
7/03/19	CJS	Communications with Alex Contreras and Mary McDaniel regarding independent observer role	.20	70.00
7/05/19	ACC	Review selection procedures for rhythmic and trampoline games in preparation for selection committee meeting	.50	107.50
7/05/19	ACC	Attend conference call with USAG selection committees for various upcoming events as independent observer	2.30	494.50
7/05/19	CJS	Revise national team handbook documents	.80	280.00

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7/06/19	ACC	Draft email to Christopher J. Schneider regarding selection committee meeting for coaches attending Worlds in Spain	.30	64.50
7/06/19	ACC	Attend conference call with USAG selection committee for rhythmic junior world championships as independent observer	1.20	258.00
7/06/19	ACC	Attend conference call with USAG selection committee for Rhythmic World championships and Pan American games as independent observer	.40	86.00
7/06/19	CJS	Revise updated language for SafeSport Policy	.10	35.00
7/06/19	CJS	Correspondence with Alejandra Contreras regarding selection committee meeting	.10	35.00
7/07/19	CJS	Correspondence with Leslie King regarding legal advice on communications statement	.10	35.00
7/08/19	CJS	Correspondence with Mary L. Tabin regarding personnel matter	.10	35.00
7/08/19	CJS	Correspondence with Alejandra Contreras and Stefanie Korepin regarding Trampoline & Tumbling selection matter	.10	35.00
7/08/19	MLT	Communications with employee regarding personnel matter	.40	160.00
7/08/19	MLT	Communication with VP of Men's programming regarding athlete issue	.10	40.00
7/09/19	MDP	Review Nike letter for USA Gymnastics	.40	78.00

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7/09/19	CJS	Office conference with Alejandra Contreras regarding selection committee meeting	.10	35.00
7/09/19	CJS	Correspondence with USOC regarding compliance checklist	.10	35.00
7/09/19	CJS	Senior leadership team meeting with Li Li Leung, Stefanie Korepin, and Bernadette Barron	1.30	455.00
7/09/19	CJS	Correspondence from USOC regarding compliance checklist	.10	35.00
7/10/19	ACC	Telephone conference with USAG program directors and Christopher J. Schneider regarding debrief regarding selection procedures	.70	150.50
7/10/19	ACC	Office conference with Christopher J. Schneider regarding whether a certain gymnastics competition is a protected competition according to USOC bylaws	.50	107.50
7/10/19	ACC	Review Ted Stevens Act, USOC Bylaws, USAG Bylaws, Section 9 complaint, and Rhythmic selection procedures to provide client with legal advice regarding same	2.40	516.00
7/10/19	MDP	Revise Nike letter for USA Gymnastics and send to Christopher J. Schneider	1.00	195.00
7/10/19	CJS	Telephone conference with Mary McDaniel regarding selection committee issue	.10	35.00
7/10/19	CJS	Telephone conference with Alejandra Contreras and USA Gymnastics regarding debrief from selection committee	.70	245.00

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meetings

7/10/19	CJS	Participate in all staff meeting by telephone	.30	105.00
7/10/19	CJS	Telephone conference with contractor regarding contract renewal	.30	105.00
7/10/19	CJS	Analysis of Board resolutions and related document regarding DIP loans	.40	140.00
7/10/19	CJS	Analysis of opportunity to compete complaint and strategy for response to same	1.50	525.00
7/10/19	CJS	Telephone conference with Li Li Leung, Stefanie Korepin, Caroline Hunt, and Mary McDaniel regarding selection committee issue	.80	280.00
7/10/19	CJS	Correspondence with Li Li Leung regarding creditor claim	.10	35.00
7/10/19	CJS	Correspondence with Board of Directors regarding resolutions for approval	.40	140.00
7/10/19	CJS	Revise section 9 response letter	.50	175.00
7/10/19	CJS	Correspondence with general creditor regarding bankruptcy claim	.20	70.00
7/11/19	ACC	Review selection committee minutes and send comments and notes to Christopher J. Schneider	.30	64.50
7/11/19	ACC	Review documents in Relativity related to certain individuals [REDACTED]	.70	150.50
7/11/19	ACC	Email to Mark Busby and Christopher J. Schneider regarding documents in Relativity related to certain	.20	43.00

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		individuals [REDACTED]		
7/11/19	ACC	Review files on Relativity related to a certain individual [REDACTED]	.70	150.50
7/11/19	ACC	Email to Mark Busby regarding files on Relativity related to a certain individual [REDACTED]	.10	21.50
7/11/19	ACC	Review Trampoline & Tumbling procedures and rules to determine certain requirements regarding selection of coaches	2.60	559.00
7/11/19	MDP	Prepare USA Gymnastics Board of Directors meeting minute notes for board call	.10	19.50
7/11/19	MDP	Telephone conference call for USA Gymnastics Board of Directors meeting minutes notes	1.20	234.00
7/11/19	MDP	Revise USA Gymnastics Board of Directors meeting minute notes	.10	19.50
7/11/19	CJS	Correspondence with Li Li Leung and Caroline Hunt regarding selection committee matter	.20	70.00
7/11/19	CJS	Correspondence with general unsecured claimant regarding claim	.20	70.00
7/11/19	CJS	Revise report of selection committee	.80	280.00
7/11/19	CJS	Revise sponsor contract	.60	210.00
7/11/19	CJS	Correspondence with Mark Busby regarding SafeSport matters	.20	70.00
7/11/19	CJS	Participate in Board of Directors telephonic meeting	1.20	420.00

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7/11/19	CJS	Prepare for Board of Directors telephonic meeting	.60	210.00
7/11/19	CJS	Correspondence with Ryan Ward regarding event contract	.20	70.00
7/11/19	CJS	Communications with Leslie King regarding legal advice on communication statement	.40	140.00
7/12/19	AMC	Review background materials regarding Memorandum of Agreement for Future Stars and Super Clinic	.30	87.00
7/12/19	ACC	Draft memorandum to Christopher J. Schneider regarding USAG Bylaws, and Trampoline & Tumbling rules regarding [REDACTED]	.90	193.50
7/12/19	CJS	Revise athlete media release and waiver for certain events	.70	245.00
7/12/19	CJS	Analysis of memorandum regarding selection committee matter	.30	105.00
7/12/19	CJS	Revise communications statement to reflect legal advice	.20	70.00
7/12/19	CJS	Telephone conference with Leslie King regarding media releases	.20	70.00
7/12/19	CJS	Participate in SafeSport meeting	.60	210.00
7/13/19	CJS	Correspondence with Li Li Leung regarding athlete matters	.20	70.00
7/14/19	CJS	Revise communications statement to reflect legal advice	.10	35.00

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7/14/19	CJS	Telephone conference with athlete, athletes' representatives, and USA Gymnastics representatives regarding WADA issue	1.00	350.00
7/14/19	CJS	Telephone conference with Li Li Leung, Stefanie Korepin, Mary McDaniel, and Jacqui Godfrey regarding WADA issue	.50	175.00
7/15/19	ACC	Emails to USAG program directors to schedule attendance at selection as independent observer	.10	21.50
7/15/19	CJS	Telephone conference with Russ Prince regarding open issues	.20	70.00
7/16/19	MDP	Compile USAG Board of Directors' votes approving Board resolutions authorizing debtor-in-possession loan	.20	39.00
7/16/19	MLT	Communication with VP of Men's Programming regarding athlete meeting	.40	160.00
7/16/19	MLT	Communication with in house counsel regarding personnel matter	.20	80.00
7/16/19	MLT	Communication with VP of Men's Programming regarding correspondence from employee	.30	120.00
7/18/19	MDP	Review and revise Debtor in Possession Loan Agreement signature page to correspond with the USA Gymnastics Board of Directors who approved the resolution to approve the Debtor in Possession Loan agreement.	.40	78.00
7/18/19	MDP	Draft Host Agreement for 2019 Future Stars and Super Clinic	.60	117.00
7/18/19	MDP	Update USA Gymnastics Board of	.10	19.50

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Directors approval tracker and send to
Christopher J. Schneider

7/18/19	CJS	Exit interview with Ryan Ward	.40	140.00
7/19/19	BRH	Review and revise letter relating to Olympic Channel email release in connection with correspondence with Christopher J. Schneider	.70	203.00
7/19/19	MMO	Draft and revise independent contractor agreement for Jennifer Banowski	.50	137.50
7/19/19	CJS	Revise contractor agreement for Acro program	.30	105.00
7/19/19	CJS	Telephone conference with Leslie King and Brittany R. Harden regarding licensing agreement	.20	70.00
7/19/19	CJS	Review draft email regarding licensing agreement	.10	35.00
7/19/19	JKS	Review and revise agreements for Future Stars and Super Clinic	1.00	350.00
7/20/19	ACC	Review selection procedures for the 2019 Pan American Women's Artistic Games in preparation for conference call with selection committee	.40	86.00
7/20/19	ACC	Telephone conference with selection committee regarding 2019 Pan American Games Women's Artistic Selection	.10	21.50
7/20/19	CJS	Conference with Mark Busby regarding SafeSport matter	.10	35.00
7/22/19	ACC	Email to Christopher J. Schneider regarding women's artistic PAG	.20	43.00

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selection committee meeting

7/22/19	CJS	Correspondence with Li Li Leung and SafeSport team regarding new matter	.20	70.00
7/22/19	CJS	Correspondence with Alejandra Contreras regarding selection committee matter	.10	35.00
7/22/19	CJS	Numerous correspondence from Mark Busby regarding SafeSport matter	.30	105.00
7/22/19	CJS	Initial review of Boarders Commission report	.20	70.00
7/22/19	CJS	Follow-up correspondence with Mark Busby regarding arbitration decision on SafeSport matter	.20	70.00
7/22/19	CJS	Analysis of USOPC's comments on compliance checklist	.50	175.00
7/22/19	CJS	Participate in SafeSport team call	1.10	385.00
7/23/19	MDP	Review and provide comments to the USA Gymnastics Championships Venue Agreement to Christopher J. Schneider	3.00	585.00
7/23/19	MDP	Emails to Jennifer Banowsky discussing the Host Agreement for the 2019 Future Stars event	.50	97.50
7/23/19	CJS	Telephone conference with Li Li Leung regarding open legal matters	.20	70.00
7/23/19	CJS	Attend senior leadership team meeting by telephone	.60	210.00
7/23/19	CJS	Draft response to Russ Prince regarding SafeSport matter	.80	280.00

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7/23/19	CJS	Telephone conference with Mark Busby regarding SafeSport matter	.10	35.00
7/23/19	CJS	Draft action plan on USOPC compliance checklist	.50	175.00
7/23/19	CJS	Correspondence with Dan Campbell and Mark Busby regarding SafeSport matter	.20	70.00
7/23/19	CJS	Revise proposed apparel agreement	.30	105.00
7/23/19	CJS	Revise Trampoline & Tumbling event contract	.40	140.00
7/24/19	MDP	Telephone call with Jennifer Banowsky discussing sanction waiver and insurance requirements in the Host Agreement	.20	39.00
7/24/19	MDP	Review and revise the Host Agreement pursuant to Jennifer Banowsky's comments to the Host Agreement.	.30	58.50
7/24/19	CJS	Revise engagement letter for proposed expert	.30	105.00
7/24/19	CJS	Communications with D. Andrew Portinga, David J. Gass, and coverage counsel regarding proposed expert	.50	175.00
7/24/19	CJS	Revise comments on event contract	1.00	350.00
7/24/19	CJS	Correspondence with Mark Busby and Amy E. Murphy regarding membership issues	.30	105.00
7/24/19	CJS	Correspondence with Li Li Leung regarding SafeSport matter	.10	35.00
7/24/19	CJS	Correspondence with Li Li Leung regarding contractual analysis	.30	105.00

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7/24/19	CJS	Analysis of AAI contract	.70	245.00
7/24/19	CJS	Correspondence with opposing counsel regarding meeting between principals	.10	35.00
7/24/19	CJS	Revise SafeSport policy to address USOPC compliance audit	1.30	455.00
7/24/19	CJS	Revise letter regarding USADA issue	.40	140.00
7/24/19	CJS	Office conference with James W. Casteel regarding SafeSport data collection	.20	70.00
7/24/19	CJS	Follow-up correspondence with Mark Busby and Shelba Waldron regarding revisions to SafeSport policy	.10	35.00
7/24/19	CJS	Review notice of withdrawal of claim	.10	35.00
7/25/19	BRH	Conduct search of current and active federally registered copyrights owned by USA Gymnastics	1.00	290.00
7/25/19	CJS	Revise response to venue regarding contract	.30	105.00
7/25/19	CJS	Office conference with Rich Perez regarding sales tax issue	.20	70.00
7/25/19	CJS	Correspondence with Mary McDaniel and Stefanie Korepin regarding immigration issue	.20	70.00
7/25/19	CJS	Conference call with Aon and Bernadette Barron regarding insurance renewal	.80	280.00
7/25/19	CJS	Review insurance renewal summary provided by Aon	.80	280.00

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7/25/19	CJS	Draft correspondence to Li Li Leung regarding insurance renewal	.40	140.00
7/25/19	CJS	Correspondence with Mark Busby regarding hearing panels	.20	70.00
7/25/19	CJS	Review new version of letter on USADA issue	.40	140.00
7/25/19	CJS	Follow-up correspondence with Mary McDaniel regarding immigration issue	.20	70.00
7/25/19	CJS	Telephone conference with Li Li Leung regarding open legal matters	.30	105.00
7/25/19	CJS	Telephone conference with Mary McDaniel regarding additional immigration issue	.20	70.00
7/25/19	CJS	Revise visa support letter	.10	35.00
7/25/19	MLT	Work on investigation report regarding personnel matter	7.10	2,840.00
7/26/19	CJS	Review revisions to letter on USADA issue	.10	35.00
7/26/19	CJS	Correspondence with Mary McDaniel and Michael E. Stroster regarding immigration issue	.10	35.00
7/26/19	CJS	Finalize action plan for USOPC compliance checklist	.30	105.00
7/26/19	CJS	Telephone conference with Erica Koven regarding sanctioned event issue	.20	70.00
7/26/19	CJS	Multiple correspondence with Li Li Leung and Leslie King regarding communications response	.50	175.00

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7/26/19	CJS	Telephone conference with Li Li Leung, Mark Busby, Leslie King and Annie Heffernon regarding SafeSport issue	.70	245.00
7/27/19	CJS	Telephone conference with Kathryn Carson and Li Li Leung regarding SafeSport matters	.70	245.00
7/27/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
7/29/19	BRH	Review and revise License Agreement with Olympic Channel	2.50	725.00
7/29/19	CJS	Participate in senior leadership team call	.50	175.00
7/29/19	CJS	Participate in SafeSport team call	1.00	350.00
7/29/19	CJS	Correspondence with Mark Busby regarding SafeSport policy question	.10	35.00
7/29/19	CJS	Correspondence with opposing counsel regarding meeting with club owners	.10	35.00
7/29/19	CJS	Draft claim submission to Everest for sanctioned event	.30	105.00
7/29/19	CJS	Correspondence with bankruptcy counsel regarding court approval for contract	.10	35.00
7/29/19	CJS	Analysis of media contracts to determine certain rights and issues	.70	245.00
7/29/19	CJS	Draft memorandum to Li Li Leung regarding rights under media contract	.30	105.00
7/29/19	CJS	Communications with Michael E. Stroster and Mary McDaniel regarding opinion letter	.30	105.00

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7/29/19	CJS	Correspondence with Jacqui Godfrey regarding Trampoline & Tumbling selection committee	.20	70.00
7/29/19	CJS	Initial review of venue's comments on event contract	.40	140.00
7/29/19	CJS	Correspondence with Aon regarding insurance renewal	.20	70.00
7/29/19	CJS	Provide legal advice on proposed communications statement to Leslie King	.10	35.00
7/29/19	CJS	Correspondence with insurer regarding report of claim	.20	70.00
7/29/19	CJS	Finalize visa support letter	.20	70.00
7/29/19	MES	Telephone conference with Christopher J. Schneider regarding request for support letter for [REDACTED] visa application from Ms. [REDACTED] agent	.80	320.00
7/30/19	ACC	Review maxient records related to certain individuals [REDACTED] per Daniel Campbell request	.60	129.00
7/30/19	BRH	Correspond with Thad Vandeventer regarding license arrangement with the Olympic Channel	.30	87.00
7/30/19	MDP	Provide comments to Christopher J. Schneider on St. Louis Convention Center's comments to the USA Gymnastics Event Agreement	1.70	331.50
7/30/19	RLP	Research and draft memo regarding the latest supreme court case South Dakota v Wayfair	1.00	125.00

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7/30/19	CJS	Correspondence with Leslie King regarding legal advice on proposed communications statement	.20	70.00
7/30/19	CJS	Correspondence with Mark Busby regarding SafeSport matter	.10	35.00
7/30/19	CJS	Correspondence with insurer regarding participant accident claim	.20	70.00
7/30/19	CJS	Telephone conference with Jacqui Godfrey, Stefanie Korepin, and Mark Busby regarding selection committee issue	1.10	385.00
7/30/19	CJS	Correspondence with Li Li Leung regarding athlete injury	.10	35.00
7/30/19	CJS	Telephone conference with Alejandra Contreras regarding files for SafeSport	.20	70.00
7/30/19	CJS	Correspondence with Li Li Leung regarding SafeSport Matter	.20	70.00
7/30/19	CJS	Revise responses to venue's comments on contract	1.10	385.00
7/31/19	BRH	Continue review of license agreement with Olympic Channel	.70	203.00
7/31/19	BRH	Prepare application summary with information necessary to file USPTO trademark application for USA Gymnastics logo	1.50	435.00
7/31/19	AEM	Research [REDACTED]	1.50	435.00

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7/31/19	MDP	Revise 2020 Trampoline and Tumbling Host Agreement to reference that host must be a member club and delete insurance language	.30	58.50
7/31/19	MDP	Draft USA Gymnastics Board of Directors Executive Meeting Minutes for July 11, 2019	.40	78.00
7/31/19	MDP	Draft USA Gymnastics Board of Directors Regular Meeting Minutes for July 11, 2019	2.10	409.50
7/31/19	RLP	Research and draft memo regarding latest Supreme Court case South Dakota v Wayfair.	1.00	125.00
7/31/19	CJS	Correspondence with venue regarding event contract	.40	140.00
7/31/19	CJS	Revise Trampoline & Tumbling form contract	.30	105.00
7/31/19	CJS	Telephone conference with David Rudd and Stefanie Korepin regarding issue for Ethics and Grievance Committee	.50	175.00
7/31/19	CJS	Telephone conference with Kevin White regarding open matters	.40	140.00
7/31/19	CJS	Revise draft letter regarding SafeSport matter	.50	175.00
7/31/19	CJS	Communication with Stefanie Korepin and Li Li Leung regarding open matters	.20	70.00

TOTAL HOURS 101.90

Total Services 30,566.00

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Attorney Summary

		<u>Hours</u>	<u>Rate</u>	<u>Amount</u>
Schwartz, Jordan K	Member	1.00	350.00	350.00
Portinga, D. Andrew	Member	.10	450.00	45.00
Schneider, Christopher J.	Member	49.30	350.00	17,255.00
Stroster, Michael E.	Member	.80	400.00	320.00
Tabin, Mary L.	Member	8.50	400.00	3,400.00
Carson, Anne Marie	Associate	1.10	290.00	319.00
Harden, Brittany R.	Associate	6.70	290.00	1,943.00
Murphy, Amy E.	Associate	1.50	290.00	435.00
O'Rourke, Matthew M.	Associate	.50	275.00	137.50
Penny, Michael D	Associate	12.60	195.00	2,457.00
Carlton, Jacob L.	Clerk	1.50	100.00	150.00
Contreras-Caballero, Alej	Associate	16.30	215.00	3,504.50
Perez, Richard L	Clerk	2.00	125.00	250.00
		101.90		30,566.00

Expenses

Reproductions 3 pages	.45	
Computer Assisted Research	56.00	
Reproductions 11 pages	1.65	
Reproductions 22 pages	3.30	
Reproductions 40 pages	6.00	
Reproductions 22 pages	3.30	
Total Expenses		70.70

Total This Invoice 30,636.70

Invoices Due Upon Receipt

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OUTSTANDING ACCOUNTS RECEIVABLE

INVOICE NUMBER	DATE	INVOICE AMOUNT	PAYMENTS AGAINST INVOICE	INVOICE BALANCE
1690179	2/14/19	73,608.76	59,124.96	14,483.80
1691021	3/18/19	64,476.01	51,679.21	12,796.80
1694037	4/17/19	81,436.49	65,321.49	16,115.00
1696899	5/21/19	73,299.57	59,053.17	14,246.40
1699811	6/13/19	83,847.71	67,560.31	16,287.40
1702747	7/15/19	94,745.27	.00	94,745.27
		Prior Unpaid Balance		168,674.67
		Total Amount Due		199,311.37

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USA Gymnastics
Accounts Payable
130 E Washington Street
Suite 700
Indianapolis, IN 46204

Re: CJS Chief Legal Officer

REMITTANCE ADVICE

For Legal Services Rendered through July 31, 2019

Total Services 30,566.00

Total Expenses 70.70

Total This Invoice 30,636.70
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Invoice Is Due Upon Receipt

Our remit address is: PO Box 306, Grand Rapids, MI. 49501-0306

Payments: If paying by check please return the remittance advice or write your invoice number(s) on your check. You may also pay by credit or debit card through our online payment portal www.millerjohnson.com/onlinepayments. If you have any questions regarding this invoice or you wish to set up ACH payments please call 616-831-1700 and ask for the collections department.